

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE NORTHERN DYNASTY
MINERALS LTD. SECURITIES
LITIGATION

Case No. 1:20-cv-05917-ENV-TAM

**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiff Lawrence Kelemen (“Lead Plaintiff”) and Named Plaintiff Charles Hymowitz (“Named Plaintiff” and, together with Lead Plaintiff, the “Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Eric N. Vitaliano, United States District Judge of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an Order: (1) preliminarily certifying the Settlement Class for settlement purposes; (2) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”) filed concurrently herewith; (3) approving the form and method for providing notice of the Settlement; and (4) scheduling a Settlement Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, all filed contemporaneously

herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiffs request that the Court enter the [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, a copy of which is attached as Exhibit A to the Stipulation.

Date: June 7, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Emma Gilmore
Emma Gilmore